Sustainable Futures P2 Assessment for SHL003

This PMN Submission is the subject of a P2 Assessment for participation in the Sustainable Futures Initiative. The P2 assessment of Hydrocarbons, C11-16, branched and linear, with CAS RN 1809170-78-2, referred to as SHL003 in the assessment, directly follows this cover letter. Additional model outputs and methods for all the P2 framework tools used in this assessment can be provided upon request.

SHL003 is an inherently low hazard substance. Extensive testing of similar GTL Solvent mixtures has shown little to no human health effects for the substances. In addition, aquatic effects testing has shown that similar alkyl mixtures with alkyl ranges of C10 and greater show low acute and chronic effects to the aquatic environment.

These results are collected in a summary reference below and attached to the PMN; they also cover previous PMNs, including P-14-132 to P-14-137, that showed for both human health and ecotoxicity concerns, EPA concurs that the hazard levels were low for alkyl ranges consisting of C10 or greater. Based on this, SHL003 is predicted to have a low human health cancer and non-cancer hazard concerns, as well as low aquatic toxify hazard concerns.

SHL003 is predicted to partition primarily to air and soil, where it will have a low concern for persistence, with an environmental half-life of <2 days in air and <60 days in all other media

The conclusion of the SHL003 aquatic risk assessment is that, based on low hazard, there is a low potential for risk to the aquatic environment.

The conclusion of the SHL003 occupational and general population risk assessments is that, based on low hazard predicted for the substance, there is a low potential for risk to human health.

It should be noted that this risk assessment does not take PPE and other exposure controls into account when determining exposure and risk. These factors would further reduce the potential for risk from this substance. It is our opinion that based on this assessment of the chemical and information included in the PMN submission and manufacturer's MSDS, including use of appropriate PPE and exposure controls, SHL003 will not pose an unreasonable risk to human health or the environment.

Sustainable Futures

Summary Assessment

Using

P2 Framework Models

This document was developed to help compile estimation results from U.S. EPA OPPT's P2 Framework Models and is used by OPPT during Sustainable Futures (SF) training described on the US EPS Sustainable Futures homepage at: http://www.epa.gov/oppt/sf/. Participants in the voluntary SF Pilot Project are asked to submit the information contained in this assessment along with their SF PMNs in their choice of format.

Use of this specific format is not mandatory.

Chemical Assessed:

Alkanes, C11-16 branched and linear

CAS Registry Number:

1809170-78-2

Participant Name:

Shell Chemical LP

Date of Assessment:

05/23/2016

Record ID: SHL003	Submitter: Shell	Chemical LP			
Chemical Structure		MW: 198.35 for	C14		
		MF: C14H30 for	r C14		
	<u>_</u>	Physical Form:	iquid		
$H_3C^2 \qquad \bigvee \qquad \bigvee \qquad \bigvee$	`R	CAS RN: 180917	70-78-2		
		Trade Name: G	S1927		
R = C1 to C6 alkyl		Use: Multiple			
		Production Volu	ıme: 63,500,00		
SMILES: CCCCCCCCCCCC [C14 linear alkyl]					
Name: Alkanes, C11-16 branched and linear					
Synonyms: GS1927					
SUSTAINABLE I	FUTURES SUMMARY	:			
Concern Level	HIGH	MODERATE	LOW		
Persistence			х		
Bioconcentration		х			
Non-Cancer Health Hazard			x		
Cancer Health Hazard			x		
Aquatic Toxicity Hazard			x		
s the chemical predicted to be a PBT by PBT Profiler?		Not run in PBT Profiler			
Overall Hazard Concern	Н	uman Health Hazard: Low Aquatic Hazard: Low	W		
		Human Health Risk: Low Aquatic Risk: Low			

Record ID: SHL003	Submitter: Shell Chemical LP					
PHYSICAL/	CHEMICAL PROPERTIES:					
Melting Point (deg C)	<20 Deg					
Boiling Point (deg C)	Range based on distillation					
Boiling Point Pressure (mm Hg)	N/A					
Vapor Pressure (mm Hg)	0.14 by analogy to C12 and 0.012 by analogy to C14 (EPI Database)					
Water Solubility	0.0037 mg/L by analogy to C12 (EPI Databas					
Log K _{ow}	>8.2 by analogy to C12 and above (EPI Database)					
ENVIRONMEN	ITAL TRANSPORT AND FATE:					
	Transport					
Henry's Law Constant – HLC (atm-m³/mol)	27 by analogy to C14 (EPI v4.11)					
Soil Adsorption Coefficient – Log K _{oc}	4.2 by analogy 10 C14 (EPI v4.11)					
Bioconcentration Factor – BCF	120 -2688 (EPI v4.11)					
	Persistence					
Experimental Biodeg Tests	>70% in 28-days, and meets the 10-day window, by analogy to GS215 (GTL USA 2016)					
Probability of Rapid Biodegradation	Will biodegrade rapidly (EPI v4.11)					
Ultimate Biodeg Model	Days by analogy to C14 >70% by analogy to GS215					
Primary Biodeg Model	Days by analogy to C14 (EPI v4.11)					
Ready Biodegradability	Ready biodegradable, by analogy to C14 (EPI v4.11)					
Atmospheric Half-life	0.6 days by analogy to C14 (EPI v4.11)					
Hydrolysis Half-life	No hydrolysable groups					
Volatilization Half-life for Model River	1.4 hours by analogy to C14 (EPI v4.11)					
Volatilization Half-life for Model Lake	5.5 day by analogy to C14 (EPI v4.11)					
Removal in Sewage Treatment Plant	99% POTW Removal by analogy to similar GTL Solvents (GTL USA 2016)					
	Byproducts					
Degradation Products						
Metabolites						

Record ID: SHL003	Submitter: Shell Chemical LP						
ECC	DTOXICITY:						
ECOSAR Class	ECOSAR Not Use; Ecotoxicity based on read across from similar GTL Solvents (GTL USA 2016)						
Acu	te Toxicity						
Fish LC₅o	96h-LL50 >100 mg/L; NOELR = 100 mg/L WAF by analogy						
	to GS215 (GTL USA 2016) 48h-EL50 >100 mg/L; NOELR = 100 mg/L WAF by analogy						
Daphnid LC₅o	to GS190 (GTL USA 2016)						
Green Algae EC ₅₀	72h-EL50 >100 mg/L; NOELR = 100 mg/L WAF by analogy						
	to GS190 (GTL USA 2016)						
Chro	onic Toxicity						
Fish ChV	NOELR ≥100 mg/L WAF by analogy to GS190 (GTL USA 2016)						
Danhaid ChV	NOELR ≥100 mg/L WAF by analogy to GS170(GTL USA						
Daphnid ChV	2016)						
Green Algae ChV	NOELR = 100 mg/L WAF by analogy to GS190 (GTL USA 2016)						
Overall Aquatic Toxicity Hazard Concern	Low						
NON-CANCER HEALTH EFFECTS:							
Acute Toxicity	Low, >5,00 mg/kg Oral LD50 and >2,000 mg/kg Dermal						
Acute Toxicity	LD50 by analogy to similar GTL Solvents (GTL USA 2016)						
Irritation	Not irritating to skin or eyes by analogy to similar GTL Solvents (GTL USA 2016)						
	Not sensitizing by analogy to similar GTL Solvents (GTL USA						
Skin Sensitizer	2016)						
Reproductive Effects	Low, by analogy to similar GTL Solvents, NOAEL of >750						
	mg/kg-day (highest dose tested) (GTL USA 2016) Low, by analogy to similar GTL Solvents, NOAEL of >866						
Developmental Effects	mg/kg-day (highest dose tested) (GTL USA 2016)						
Neurotoxicity and Immune System Effects	No data available						
Genotoxicity	Not genotoxic by analogy to similar GTL Solvents (GTL USA 2016)						
Mutagenicity	Not mutagenic by analogy to similar GTL Solvents (GTL USA 2016)						
Sustainin Effects	Low, by analogy to C8 to C24 GTL Solvents; little or no						
Systemic Effects	effects observed in multiple dosing scenarios (GTL USA 2016)						
Overall Human Health Non-Cancer Hazard Concern	Low						
CANCER H	HEALTH EFFECTS:						
Experimental data	Not Carcinogenic by analogy to similar GTL Solvents (GTL USA 2016)						
OncoLogic Results	No SAR for Oncologic Evaluation						
Overall Human Carcinogenicity Hazard Concern	Low						
<u> </u>							

Record ID: S	HL00)3				Submitter: Shell Chemical LP						
				INDUSTRIAI	L OPERA	TIONS	INFORMAT	ION:				
Operation N	ame				Import	t Number of Sites				1		1
Location			Channelview TX			Оре	erating Days	Per Year				300
				INDUST	RIAL RE	LEASE	SUMMARY	•				
Release sou	rce	Daily Relea (kg/site-da		lease Days Year	No. of of Rele	Sites	Total Relea	ase		ation	ease Site n and Control	
Loading to drums		0.005		300	1		1.6	j		Aiı		Air
Loading to to trucks	ank	0.008		300	1		2.3	3			,	
Loading to ra	ail	0.008		300	1		2.3	}				
				OCCUPATI	ONAL E	XPOSL	JRE SUMMA	ARY:				
Route	Do	se Rate	Days/yr	No. Wor	kers Canc		· LADD	Chronic	ADD	D Acute APDR		
Dermal	2,2	50 mg/day	250	1		23 mg/kg-day 22 m		ng/kg-day 32 mg/kg-day		ay .		
Inhalation	11	12 mg/day	250	1		0.6 mg/kg-day 1.1 m		ng/kg-day 1.6 mg/kg-day		ау		
Total number	er of	Workers – A	All Sites								l	
			GE	NERAL POP	ULATIO	N EXP	OSURE SUM	IMARY:				
				ancer LADD			Chronic A				Acute ADRpot	
Drinking Wa	ter				• 			•			•	
Fish Ingestic	n											
Fugitive Emi	ssior	ıs										
Incineration												
Landfill Lead	_											
Dermal – Co												
Inhalation -	Con	sumer Use										

Record ID: SHL0	03				Submi	tter: Shell Chemi	ical LP		
			INDUSTRIAL	. OPERAT	IONS IN	FORMATION:			
Operation Name	9			Import	Numbe	er of Sites			1
Location			Channe	lview TX	Operat	ting Days Per Ye	ar		300
			AQU	ATIC RISH	(ASSESS	SMENT			
Acute Profile	Endpoi	nt	ent Effect Level Assessment (ppb) Factor			Acute COC (ppb)	PE	EC (ppb)	Potential for Risk
	Fish		Low hazard	N,	/A	N/A		0	Low
	Daphn	id	Low hazard N		/A	N/A		0	Low
	Green A	gae	Low hazard	N,	/A	N/A		0	Low
Chronic Profile	Endpoi	nt	2.1.000 2000.		sment ctor	Chronic COC (ppb)	PEC (ppb)	Days of Exceedance	Potential for Risk
	Fish		Low hazard	N,	/A	N/A	0	0	Low
	Daphnid		Low hazard	N,	/A	N/A	0	0	Low
	Green A	gae	Low hazard	N,	/A	N/A	0	0	Low
			HUMAN	HEALTH	RISK AS	SESSMENT			
	н	azard (Concern	NOAEL/ (mg/l		Exposure Source (n		МОЕ	Potential for Risk
Occupational Ri	sk	Low H	azard	N/	'A	N/	'A	N/A	Low
General		Low H	azard	N/	N/A A/N		'A	N/A	Low
Population Ris	k								
	'			RISK ASSE	SSMEN	T SUMMARY		1	•
Aquatic Risk Co	ncerns for th	is Ope	ration						Low
Basis for Concer	ns: Low bas	ed on l	ow hazard						
			HEALTH R	ISK ASSES	SSMENT	SUMMARY			
Human Health	Risk Conce	rns for	this Operation						Low
Basis for Concer	ns: Low bas	ed on l	ow hazard						

Record ID: S	HLOC)3				Sub	Submitter: Shell Chemical LP					
				INDUSTRIA	L OPERA	TIONS	INFORMAT	ION:				
Operation N	ame		Proce	ssing for coa	tings use	Nur	nber of Site	s			289	
Location					Multiple	Оре	erating Days	Per Year			250	
				INDUS	TRIAL RE	LEASE	SUMMARY	:		<u> </u>		
Release sou	ease source Daily Release Release Days (kg/site-day) per Year			elease Days	No. of	Sites	Total Relea	ase		atior	ease Site n and Control	
Transport Drum cleani	ng	6.2	1	52	289		274,000				POTW; >90% removal	
Processing vessel cleani	ng	1.3	2.	50	289		91,300			POTW; >90% rem		
	1						JRE SUMMA					
Route	Do	se Rate	Days/y	r No. Woi	rkers	Cance	LADD	Chronic	ADD		Acute APDR	
Dermal	3,1	.00 mg/day	250	289	9	17 m	ıg/kg-day	30 m	g/kg-da	У	44 mg/kg-day	
Inhalation	0.2	23 mg/day	250	289	Э	1.3E-3	mg/kg-day	2.2E-2	mg/kg-d	day	3.3E-3 mg/kg-day	
Total number	er of	Workers – A	All Sites									
			G	SENERAL POI	PULATIO	N EXP	OSURE SUM	IMARY:				
				Cancer LADE	Opot		Chronic A	DDpot		Acute ADRpot		
Drinking Wa	ter				-			<u> </u>			•	
Fish Ingestic												
Fugitive Emi	ssior	าร										
Incineration	Emi	ssions										
Landfill Lead												
Dermal – Co												
Inhalation -	Con	sumer Use										

Record ID: SHLO	03				Submi	tter: Shell Chemi	ical LP		
			INDUSTRIAL	OPERAT	IONS IN	FORMATION:			
Operation Name	2	Pro	ocessing for coati	ngs use	Numb	er of Sites			289
Location			N	Лultiple	Opera	ting Days Per Ye	ar		250
			AQUA	ATIC RISH	(ASSESS	SMENT			
Acute Profile	Endpo	int	Effect Level (ppb)		sment ctor	Acute COC (ppb)	PE	EC (ppb)	Potential for Risk
	Fish		Low hazard	N,	/A	N/A		0	Low
	Daphnid		Low hazard	N,	/A	N/A		0	Low
	Green A	lgae	Low hazard	N,	/A	N/A		0	Low
Chronic Profile	Endpo	int	Effect Level (ppb)		ssment Chronic COC actor (ppb)		PEC (ppb)	Days of Exceedance	Potential for Risk
	Fisl		Low hazard	N,	/A	N/A	0	0	Low
	Daph	nid	Low hazard	N,	/A	N/A	0	0	Low
	Green A	lgae	Low hazard	N,	/A	N/A	0	0	Low
			HUMAN	HEALTH	RISK AS	SESSMENT			
	1	lazard	Concern	NOAEL/ (mg/l		Exposure Source (n		МОЕ	Potential for Risk
Occupational Ri	sk	Low H	Hazard	N/	'A	N/	'A	N/A	Low
General Population Ris	k	Low I	Hazard	N/	'A	N/	Ά	N/A	Low
			AQUATIC R	ISK ASSE	SSMEN	T SUMMARY			l
Aquatic Risk Cor	ncerns for	his Op	eration						Low
Basis for Concer	ns: Low ris	k based	d on low hazard.						
Human Health	Risk Conc	arns fo	HEALTH RI	SK ASSES	SSMENT	SUMMARY			Low
Human Health	I MISK COILC	21113 10	ans Operation						LOW
Basis for Concer	ns: Low ris	k based	d on low hazard.						

Record ID: SI	HLOC)3				Sub	mitter: She	ell Chemic	cal LP		
				INDUSTRIA	L OPERA	ATIONS	SINFORMAT	ION:			
Operation Na	ame			Use-	Multiple	e Nur	mber of Site	s			Multiple
Location					Multiple	Оре	Operating Days Per Year				
				INDUST	TRIAL RI	ELEASE	SUMMARY	:			
Release sour	source Daily Release (kg/site-day) Release		lease Days Year	No. of Sites of Release		se (kg/year -all sites) Ir		Inform	Media, Release Site Information and Control Efficiency		
Cleaning transport drums		4.4	160)	196		137,000		POTW; >90% re		POTW; >90% removal
Equipment cleaning		1.9	250)	196		91,000			POTW; >90% remov	
Misc sources from roll equipment cleaning		0.9	250)	196		45,600		POTW; >90% remo		POTW; >90% removal
			•	OCCUPATI	ONAL E	XPOSU	JRE SUMMA	λRY:			
Route	Do	se Rate	Days/yr	No. Wor	kers	Cance	r LADD	Chronic	ADD		Acute APDR
Dermal	7,7	'00 mg/day	250	196	j	43 m	ng/kg-day	75 m	75 mg/kg-day		110 mg/kg-day
Inhalation	0.2	24 mg/day	250	196	5	1.4E-3	mg/kg-day	2.4E-3	mg/kg-d	day	3.5E-3 mg/kg-day
Total numbe	r of	Workers – A	All Sites								
			GI	NERAL POP	ULATIC	N EXP	OSURE SUM	IMARY:			
			С	ancer LADD	pot		Chronic A	DDpot			Acute ADRpot
Drinking Wa	ter										
Fish Ingestio	n										
Fugitive Emis											
Incineration											
Landfill Leac											
Dermal – Co											
Inhalation -	Con	sumer Use									

Chronic Profile En	Endpoint Fish Daphnid een Algae Endpoint	Multip	ATIC RISK Assess Fac N, N,	Operate CASSESS Sment Ctor /A /A /A	Acute COC (ppb) N/A N/A		C (ppb)	Multiple Potential for Risk Low
Acute Profile Chronic Profile En	Fish Daphnid een Algae	AQUA Effect Level (ppb) Low hazard Low hazard Low hazard Effect Level	ATIC RISK Assess Fac N, N,	Operate CASSESS sment ctor /A /A /A	Acute COC (ppb) N/A N/A		0	Potential for Risk
Acute Profile D Gre Chronic Profile EI	Fish Daphnid een Algae	Effect Level (ppb) Low hazard Low hazard Low hazard Effect Level	ASSESS FACE N,	C ASSESS sment ctor /A /A	Acute COC (ppb) N/A N/A		0	for Risk
Chronic Profile En	Fish Daphnid een Algae	Effect Level (ppb) Low hazard Low hazard Low hazard Effect Level	Assess Fac N,	sment ctor /A /A /A	Acute COC (ppb) N/A N/A	PE	0	for Risk
Chronic Profile En	Fish Daphnid een Algae	(ppb) Low hazard Low hazard Low hazard Effect Level	Fac N, N,	/A /A /A	(ppb) N/A N/A	PE	0	for Risk
Chronic Profile E	Daphnid een Algae	Low hazard Low hazard Effect Level	N,	/A /A	N/A			Low
Chronic Profile E	een Algae	Low hazard Effect Level	N,	/A	-		0	
Chronic Profile		Effect Level					U	Low
Profile E	Indpoint		Assess		N/A		0	Low
D					Chronic COC (ppb)	PEC (ppb)	Days of Exceedance	Potential for Risk
D	Fish	Low hazard	N,	/A	N/A	0	0	Low
	Daphnid	d Low hazard		/A	N/A	0	0	Low
Gre	een Algae	Low hazard	N,	/A	N/A	0	0	Low
		HUMAN	HEALTH	RISK AS	SESSMENT			
	Hazard (Concern	NOAEL/ (mg/l		Exposure Source (n		МОЕ	Potential for Risk
Occupational Risk	Low H	azard	N/	'A	N/	'A	N/A	Low
General Population Risk	Low H	azard	N/	'A	N/	'A	N/A	Low
T Opulation Risk		AOUATIC R	ICK VCCE	SSMENI	 Γ SUMMARY			
Aquatic Risk Concerns	for this Ope		ISK ASSE	SSIVILIA	1 JOIVIIVIAILI			Low
Basis for Concerns: Lov	w risk based	on low hazard.	1					
		HEALTH RI	SK ASSES	SSMENT	SUMMARY			
Human Health Risk (Concerns for	this Operation						Low

SUMMARY CONCLUSIONS:

Occupational Risk:

Risk of Non-Cancer Acute Effects from Occupational Exposure: Low due to low hazard.

Risk of Non-Cancer Chronic Effects from Occupational Exposure: Low due to low hazard.

Risk of Cancer Effects from Occupational Exposure: Low due to low hazard.

General Population Risk:

Risk of Non-Cancer Acute Effects to General Population: Low due to low hazard.

Risk of Non-Cancer Chronic Effects to General Population: Low due to low hazard.

Risk of Cancer Effects to General Population: Low due to low hazard.

Aquatic Risk:

Acute Risk to the Aquatic Environment: Low due to low hazard. Chronic Risk to the Aquatic Environment: Low due to low hazard.

Composition and Representative Structures

	%linear/%branched (% anticipated range)
Carbon #	GTL GS1927
10 or less	0.6/0.2 (<10)
11	5.3/4.8 (<15)
12	4.3/13.2 (10-25)
13	7.2/17.9 (10-30)
14	3.6/16.7 (15-30)
15	3.9/15.2 (10-30)
16	0/7.1 (2-15)
17 or more	0/0 (<5)

Physical Property and Environmental Fate

SHL003 environmental fate assessment is based on the read-across from similar GTL solvents, data available for representative alkyl length components, and EPI Suite estimation. The specific end points and sources are listed in the tables above. Overall, SHL003 is a volatile, hydrophobic hydrocarbon solvent. The substance is expected to exist as a vapor in the atmosphere, where it will have a half-life of 0.6 days. The substance is predicted to have 99% removal in POTW, through a combination of air stripping, sludge adsorption, and biodegradation; EPA has evaluated similar compounds and found the same conclusion. In the environment, SHL003 is expected to be rapidly biodegraded, based on data for similar GTL solvents.

If released to the environment, SHL003 is expected to partition to air and soil, where it will have a low overall concern for persistence.

Aquatic Hazard

This table has been prepared to provide an overview of the environmental hazard profile of Shl003 and is based on available experimental data for other GTL Solvents. As shown in Figure 1, due to the sequential distillation process, SHL003 is a precursor to solvents GS190, GS215 and GS250, all of which have been listed on TSCA. This provides a strong case for read-across of data from these solvents to SHL003. For clarity, the composition of GS1927 is compared with GS190, GS215, and GS250 in Table 2. This demonstrates that these products span the full carbon range of GS1927, and that the same types of molecules are present in each of these products. The data available for supporting substances are appropriate and sufficient to fully characterize the endpoints for GS1927.

Table 2: Composition of Shell GTL solvents GS190, GS215, GS250, and GS1927

	% Linear/% Branched (% anticipated range)										
Carbon #	GTL GS190	GTL GS215	GTL GS250	GTL GS1927							
10 or less	3.2/3.0 (5-10)			0.6/0.2 (<10)							
11	8.1/19.7 (20-35)	1.1/1.4 (<5)		5.3/4.8 (<15)							
12	7.0/39.7 (40-55)	4.0/10.3 (10-25)		4.3/13.2 (10-25)							
13	0.7/17.7 (10-25)	7.5/29.1 (30-45)	1.2/1.5 (<5)	7.2/17.9 (10-30)							
14	0/0.9 (<5)	4.4/33.8 (30-45)	8.8/15.6 (15-30)	3.6/16.7 (15-30)							
15		0.1/8.2 (5-15)	8.9/44.7 (45-60)	3.9/15.2 (10-30)							
16		0/0.1 (<5)	0.5/18.5 (10-25)	0/7.1 (2-15)							
17 or more			0/0.3 (<5)	0/0 (<5)							

The bioavailability of the GTL products is limited by their water solubility due to their long carbon chain length and relatively simple branching. While no experimental data is available for the specific PMN substance GS1927, there is data on the related GTL solvents that either compose GS1927 or are close in carbon range. In all studies, no adverse effects were observed at the highest loading rates tested in water-accommodated fractions (WAFs), which was 100 mg/L. The acute toxicity tests showed the LL_{50} for fish, EL_{50} (daphnia), and ErL_{50} (algae) were >100 mg/L. There were also no sublethal effects observed in fish, daphnia, and algae chronic toxicity tests with GS170 and GS190, which have shorter carbon chain lengths. Since GS170 and GS190 are lighter, more water-soluble cuts, with smaller average carbon chain length, their toxicity tests are considered to give a conservative result for read-across to GS1927. All testing has been GLP certified.

Based on data for related GTL solvents, it can be concluded that GS1927 is not acutely or chronically toxic to aquatic organisms.

Human Health Non-Cancer and Cancer Hazards

Please see Shell GTL Solvents GS1927 and GS2735 notification Expert human health hazard assessment support document, attachment to PMN with test results for similar GTL Solvents, for a comprehensive review of study data for similar GTL Solvents and Fractions (GTL USA 2016).

Release and Exposure Sources

SHL003 will be imported at 100% in tankers from Europe and unloaded to feed tanks at Boasso America Corp in Channnelview TX. SHL003 Will be transferred to railcars, tank trucks and isotanks with the majority of containers dedicated and requiring no cleaning. A second storage location for isotanks is in Linden, New Jersey. SHL003 will be used in formulating coatings (25%) cleaning fluids (9.5%), agrochemical production (3.2%), metal working fluids/rolling oils (8.9%) and sold as an intermediate (53.4%). As a worst case scenario, activities modeled include loading SHL003 into tank trucks, rail cars and drums.

25% of SHL003 is processed to approximately 70% for use as a cured coating. Based on EPA modeling scenarios for similar activities, the coating is unloaded from drums and used at 289 sites over 250 days in batches of 520 kg/batch. Modeled activities include unloading and cleaning transport drums, vessel cleaning and filter media change out. 12.5% of the PMN substance is used as a roll coating at 196 sites over 250 days at 70% concentration. Modeled activities include unloading and cleaning transport drums, equipment cleaning, roll coating and misc. sources from roll equipment cleaning.

9.5% of SHL003 is processed to 5% for use as a cleaning fluid. Based on EPA modeling scenarios for similar activities, the substance is processed into the formulation over 250 days and 11,520 kg/site, and loaded to drums. 6% of the PMN is for non-consumer/industrial/commercial use over 250 days, at a final concentration of 2.5% at 75,600 sites. Average use is 10 kg/site/day with 97% expected release in wash water.

3.2% of SHL003 is processed to 45% at 1 site over 250 days for use as an agrochemical. Modeled activities include unloading trucks, and large vessel cleaning.

8.9% of SHL003 is shipped in tank trucks and processed to 35% at 267 sites then shipped in drums for use as a metal working/rolling oil fluid. Use takes place at 13,522 sites. Modeled activities using the metalworking default scenario operation.

53.4% of SHL003 is processed for use as a chemical intermediate. Processing at 16 sites over 250 days in 20,000 kg batches. Modeled activities is only for unloading tank trucks.

The table above show potential releases and exposures for the initial transfer operation, as well as worst case scenario release and exposure scenarios for selected modeled operations.

Environmental (Aquatic) Risk Assessment

Assessment of aquatic risk is based on comparison of the concentration of the chemical in the environment, referred to as the predicted environmental concentration (PEC), to any acute and/or chronic concentrations of concern (COCs) established for the chemical. Acute risk potential is determined by direct comparison of the PEC to an acute COC, with the potential for risk being indicated if the PEC is larger than the acute COC. Chronic risk is determined both by comparison of the PEC to the chronic COC, similar to the acute risk assessment, and by E-FAST estimation of the number of days the PEC will exceed the chronic COC, with risk potential indicated if the PEC exceeds the chronic COC for 20 days or more.

Risk is a function of hazard and exposure; if the hazard concern level is low, then the risk should generally be low. SHL003 has been predicted to have low overall ecotoxicity hazard concerns. Based on this, the potential for risk to aquatic environment is also predicted to be low.

Overall, based on low hazard, SHL003 is expected to pose a low potential for risk to the aquatic environment.

Human Health Risk Assessment

Human health risk potential is established by comparison of the potential health effect levels to the occupational and general population dose rates estimated for the chemical. The health effect is divided by the largest dose rate for either occupational or general population exposure to give a margin of exposure (MOE). Acute risk is only evaluated if the acute LD_{50} is found to be <50 mg/kg. Chronic risk is evaluated for each effect level identified in the human health hazard assessment that has a moderate or greater hazard concern. The magnitude of the MOE determines if the potential for risk exists; if based on a LOAEL (lowest observed adverse effect level) a MOE of <1,000 indicates the potential for human health risk exists and if based on a NOAEL (no observed adverse effect level) a MOE of <100 indicates the potential for risk exists.

Risk is a function of hazard and exposure and if the hazard concern level is low, then the risk will generally also be low. SHL003 has been predicted to have low overall human health cancer and non-concern hazard concerns. Based on this, the potential for risk to human health from exposure to the substance is also predicted to be low. It should be noted that SHL003 is predicted to cause irritation and/or sensitization, however, these effects are not used to quantify risk and proper PPE is indicated to mitigate any potential risks.

Overall, SHL003 is predicted to have low human health risk concerns, based low human health cancer and non-cancer hazard concern levels.

References

Previous PMNs for GS170, GS190, GS215 and GS250

(GTL USA 2016) Shell GTL Solvents GS1927 and GS2735 notification Expert human health hazard assessment support document, attachment to PMN with test results for similar GTL Solvents.